

EXHIBIT E

1 BY MR. COOLEY:

2 Q. Mr. Vandeven, yesterday
3 there were a series of questions
4 about Handy & Harman wastes and then
5 some questions about individual
6 company wastes as opposed to types of
7 wastes.

8 And in that line of
9 questions you testified, I believe,
10 that you did not have any knowledge,
11 specific or general about the wastes
12 of Handy & Harman.

13 Now, I know there were then
14 some follow-up questions or later
15 questions regarding a certain sludge
16 material. But Mr. Harris then
17 attempted to confirm for us what your
18 opinions would relate to and what
19 they wouldn't relate to.

20 So my question, with that
21 reminder is as follows: Is it true
22 for each of the defendants in this
23 case that you do not have any
24 knowledge specifically about their



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DEPOSITION OF JAY VANDEVEN, VOLUME II, 2/14/07

1 wastes generated at their facilities
2 and you are not going to be rendering
3 any opinions about the wastes
4 specifically generated by the
5 defendants in this case?

6 A. That's true, yes.

7 Q. Would the same be true for
8 the plaintiff companies in the case?

9 A. Yes.

10 MR. HARRIS: Just an excess
11 of caution, he will be saying that
12 circuit board etchant may have been
13 disposed at the site and that it's an
14 acidic solution to dissolve copper
15 and manufactured circuit boards, but
16 he won't say that that's in your
17 guy's waste stream versus anybody
18 else's waste stream.

19 BY MR. COOLEY:

20 Q. Okay. Well, why don't we
21 turn then to that page, which I
22 believe is 15 of Vandeven-1, your
23 original expert report.

24 A. You have taken all the



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